

NEW LIFE WORSHIP CENTER

915 Douglas Pike, Smithfield, RI 02917 • Phone 401-232-5200 / Fax 401-232-0015

Received & Inspected

December 14, 2011

Office of the Secretary
Federal Communications Commission
Attention: Disability Rights Office, Room 3-B431
9300 East Hampton Drive
Capitol Heights, MD 20743

DEC 15 2011

FCC Mail Room

Re: Petition for exemption from the closed captioning rules

New Life Worship Center, a Christian Family Church, is hereby petitioning an exemption from the closed caption requirements for the program, "Life in Christ." Closed captioning would result in a "significant difficulty or expense" on the church. Our video programming distributor does not provide closed captioning as evidenced by enclosed letter. The Life in Christ program does show text with scripture readings and various graphic displays, but these items do not pose any additional expense to the church. It should be noted the Federal Communications Commission had previously provided an exemption to Life in Christ from Closed Captioning rules in September 2006.

Nature and Cost of Closed Captions for the Programming

New Life Worship Center is a non-denominational Christian family church solely supported by the contributions of its members. New Life Worship Center operates under a 501c3 tax status and supports the video program called "Life in Christ," which airs weekly on local television networks. The program is a blessing to the community, and especially to people who are unable to physically attend church, including many elderly people and the disabled.

Over the past two years, 2010 and 2011, the "Life in Christ' television program (the program) operated at a financial loss of \$87,782 and \$63,678, respectively. The fund statement for the New Life Worship Center program is enclosed. Donations towards the program do not support operating expenses. Closed captioning will result in an additional financial burden of approximately \$15,600 for the two half hour Life in Christ programs.. Enclosed is documentation supporting the average cost of closed captioning provided by vendors.

Impact on the Operation of the Provider

New Life Worship Center is a church and non-profit organization that supports all its ministries and operations through contributions. The church has attempted to make the Life in Christ program self-supporting, but to date the program operates at a financial loss

to the church, with expenses far exceeding contributions. This can be seen on the enclosed financial fund statement. Additional costs of closed captioning may result in the inability to continue the Life in Christ television program.

Financial Resources of the Provider

New Life Worship Center is the provider of the Life in Christ television program. The church is on a cash basis of accounting and uses fund accounting to report the activities of the various departments. Funds donated by contributors must be applied to the various areas to which donors make their contributions. The enclosed fund statement for the television program Life in Christ shows the annual deficit of the program. The church attempts to raise revenue for the Life in Christ program through sponsors and asking church members for weekly contributions to the program. But contributions do not support expenses as evidenced on the enclosed fund statement. The church has subsidized the losses of Life in Christ. In addition to contributions, the church may use bank credit to support its operations.

Type of Operations of the Provider

New Life Worship Center is a Christian Family Church that has many community ministries including benevolence ministries to the needy, children's and youth programs, missionary outreach, a food pantry and television ministry. The ministries of the church are of tremendous benefit to the community and serve to help the poor and strengthen families and individuals.

The television program of the church, "Life in Christ" provides the community with a Sunday video presentation of the church service. This is beneficial to people who may have challenges physically attending the church. The cost of close captioning places an undue burden on the church as it tries to help needy people.

The Life in Christ television program does show scripture text and graphic displays that support the message being preached on the program. These visual tools communicate effectively but do not pose an undue financial hardship on the church. It has been difficult to generate sufficient revenue to support the Life in Christ program, but we continue to work diligently on keeping the program on air. Any additional costs may result in the church's inability to continue providing the Life in Christ program to people who are benefiting from it, including shut-ins and the elderly.

Should you have any questions, you may call Cindy Albanese or myself at 401-232-5200.

Sincerely,

Ron Termale, Associate Pastor

December 7, 2011

VIA ELECTRONIC MAIL

Ron Termale New Life Worship Center 915 Douglas Pike Smithfield, RI 02917

RE: WNAC-TV Captioning Services

Dear Mr. Termale,

WNAC-TV does not provide live, real-time captioning in-house. We do, however, have a relationship with a third party captioning provider, Dynamic Captioning, LLC. Should you wish to contact Dynamic Captioning, LLC to obtain captioning services, the applicable contact information is listed below. Please tell them you are a paid programming client of WNAC-TV.

Craig Wilson / President

DYNAMIC CAPTIONING LLC

5740 Foremost Drive SE

Grand Rapids, MI 49546

Phone: 616-974-0811

Cell: 616-443-4999

Craig.Wilson@DynamicCaptioning.com

www.DynamicCaptioning.com

New Life Worship Center

Income and Expense Statement (UNAUDITED)

Page: 1

12/06/2011 09:17 AM

TELEVISION FUND 07, January 2011 - December 2011

Current Period	Prior Year	Year to Date	YTD Prior Year
\$8,280.25	\$13,769.31	\$8,280.25	\$13,769.31
2,973.46	0.00	2,973.46	0.00
11,253.71	13,769.31	11,253.71	13,769.31
\$99.035.71	\$77 <i>44</i> 7 38	\$99 035 71	\$77,447.38
	Ψ11,441.30	ψ33,033.71	Ψ11,441.50
99,035.71	77,447.38	99,035.71	77,447.38
-\$87,782.00	-\$63,678.07	-\$87,782.00	-\$63,678.07
	\$8,280.25 2,973.46 11,253.71 \$99,035.71 99,035.71	\$8,280.25 \$13,769.31 2,973.46 0.00 11,253.71 13,769.31 \$99,035.71 \$77,447.38 99,035.71 77,447.38	\$8,280.25 \$13,769.31 \$8,280.25 2,973.46 0.00 2,973.46 11,253.71 13,769.31 11,253.71 \$99,035.71 \$77,447.38 \$99,035.71 99,035.71 77,447.38 99,035.71

Lag Tenl, Trusma

12/06/2011 09:19 AM

Account Activity, January 2011 - December 2011

07-5326-351 TV-Pro						
01-0020-001 17-110	grams			Beginning Balance	0.00	
49092	AP	1/7/2011	January 2011	RobSantilli-TVwe12/31	256.50	
ONLINE PAYMENT	AR	1/7/2011	January 2011	CitiC-TVprogram	4,700.00	
49136	AP	1/18/2011	January 2011	RobSantilli-TVwe1/8	200.25	
49137	AP	1/19/2011	January 2011	PointToDesgn-TVyoNLFcsEG - PointToDesign-TVprogram	200.00	
19138	AP	1/19/2011	January 2011	PointToDesign-TVorWebcs - PointToDesgn-TVprogram	60.00	
49179	AP	1/21/2011	January 2011	FedEx-MiscReimTVminProg - FedEx-TVminProgram	18.70	
49211	AP	1/21/2011	January 2011	TribuneMedia-TVprogAdv	56.30	
19240	AP	1/28/2011	January 2011	RobSantilli-TVwe1/22	247.50	
49251	AP	1/28/2011	January 2011	PointToDesgn-YOmraWebCS - PointToDesgn-TVprog	170.00	
19278	AP	2/4/2011	February 2011	RobSantilli-TVwe1/29	351.00	
19282	AP	2/4/2011	February 2011	PointToDesgn-TVwebMRAcs - PointToDesgn-TVprog	205.00	
ONLINE PAYMENT	AP	2/9/2011	February 2011	Citic-TVprogTapesShow	3,758.49	
19349	AP	2/10/2011	February 2011	PointToDesign-YOwebsPubTV - PointToDesgn-TVprogram	165.00	
49342	AP	2/11/2011	February 2011	RobSantilli-TVwe2/4	234.00	
49374	AP	2/18/2011	February 2011	RobSantilli-TVwe2/11	193.50	
49380	AP	2/18/2011	February 2011	PointToDesgn-TVoffComEG - PointToDesgn-TVprogram	260.00	
49406	AP	2/24/2011	February 2011	PointToDesgn-TVoffCompWeb - PointToDesign-TVprog	295.00	
49408	AP	2/25/2011	February 2011	RobSantilli-TVwe2/18	247.50	
49437	AP	3/2/2011	March 2011	FedEx-TVprogTapesSent	38.92	
19463	AP	3/2/2011	March 2011	TribuneMedia-TVprogram	45.04	
19489	AP	3/4/2011	March 2011	Point7Creative-TVwebMRAeg - Point7Creative-TVprogram	270.00	
49495	AP	3/4/2011	March 2011	RobSantilli-TVprogWE2/26	137.25	
ONLINE PAYMENT	AP	3/8/2011	March 2011	Citic-TVprogTapes	252.50	
19500	AP	3/9/2011	March 2011	UPS-TVminReprCamera	15.09	
19523	AP	3/10/2011	March 2011	Point7Creative-TVmraCSorW - Point7Creative-TVprog	275.00	
19520	AP	3/11/2011	March 2011	RobSantilli-TVprogWE3/4	90.00	
49564	AP	3/15/2011	March 2011	Point7Creative-EGtvKCorWe - Point7Creative-TVprog	240.00	
49562	AP	3/18/2011	March 2011	RobSantilli-TVprogWE3/12	236.25	
49590	AP	3/24/2011	March 2011	Point7Creative-TVcsXcelAw - Point7Creative-TVprog	215.00	
49593	AP	3/25/2011	March 2011	RobSantilli-TVprogWE3/18	414.00	
49610	AP	3/25/2011	March 2011	ChristnVideoLic-TVminAnnI - CVLI-TVminAnnual	278.00	
49613	AP	3/25/2011	March 2011	FedEx-TVprogTapesSent	82.96	
49645	AP	3/25/2011	March 2011	TribuneMedia-TVprogAdv	45.04	
49657	AP	4/1/2011	April 2011	Point7Creative-TVwevMRAof - Point7Creative-TVprogram	315.00	
49659		4/1/2011	April 2011	RobSantilli-TVwe3/26	238.50	
49680	AP	4/1/2011	April 2011	RobSantilli-TVprogXcelDru - RobSantilli-TVprogLegsStn	340.99	
49706	AP	4/7/2011	April 2011	Point7Creative-TVcsAnnWeb - Point7Creative-TVprogram	210.00	
ONLINE PAYMENT		4/7/2011	April 2011	Citic-TVprogExp	7,459.33	
49762	AP	4/14/2011	April 2011	FedEx-TVprogTapesSent	59.43	
49787	AP	4/14/2011	April 2011	TribuneMedia-TVprogram	45.04	
49795 49824	AP AP	4/14/2011 4/21/2011	April 2011 April 2011	Point7Creative-TVcsWebEGa - Point7Creative-TVprogram Point7Creative-TVprog	260.00 195.00	
49909	AP	4/29/2011	April 2011	Point7Creative-TVcsEGwebs -	260.00	
49953	AP	5/4/2011	May 2011	Point7Creative-TVprogram Point7Creative-TVprogram Point7Creative-TVprog	260.00	
		5/6/2011	May 2011	Point7Creative-TVwebPubEG - Point7Creative-TVprog	365.00	
	40		IVIDY AUTI	- Cittle Olegave 1 v Webl ublid - I Ollit Olegave-1 vplog	303.00	
50004	AP		The state of the s			
50004 ONLINE PAYMENT 50033	AP AP	5/6/2011 5/19/2011	May 2011 May 2011	Citic-TVprogram Point7Creative-TVegCSweb - Point7Creative-TVprog	3,649.39 305.00	

Page: 1

New Life Worship Center Account Activity, January 2011 - December 2011

12/06/2011 09:19 AM

Page: 2

Reference	Journal	Date	Month	Description	Debit	Credit
50077	AP	5/24/2011	May 2011	Oce-Copies - Oce-TVcopies	1.30	
50102	AP	5/24/2011	May 2011	TribuneMedia-TVprogAdv	45.04	
50112	AP	5/25/2011	May 2011	Point7Creative-TVcsEGwebs - Point7Creative-TVprogram	235.00	
50127	AP	5/26/2011	May 2011	Point7Creative-TVbonus	2,000.00	
50138	AP	6/2/2011	June 2011	Point7Creative-TVwebEGcs - Point7Creative-Program	460.00	
50175	AP	6/8/2011	June 2011	Point7Creative-TVwebPubCS - Point7Creative-TVprog	515.00	
ONLINE PAYMENT	AP	6/9/2011	June 2011	Citic-TVprog	6,322.54	
50232	AP	6/15/2011	June 2011	FedEx-TVprogTapesSent	41.24	
50273	AP	6/15/2011	June 2011	TribuneMedia-TVprog	45.04	
50300	AP	6/16/2011	June 2011	Point7Creative-TVcsEGannO - Point7Creative-TVprog	380.00	
50348	AP	6/23/2011	June 2011	Point7Creative-TVwebEGcs - Point7Creative-TVprog	405.00	
50377	AP	6/30/2011	June 2011	Point7Creative-TVegCSpub - Point7Creative-TVprogram	595.00	
50441	AP	7/7/2011	July 2011	Point7Creative-TVorWebCSe - Point7Creative-TVprog	690.00	
50488	AP	7/8/2011	July 2011	TribuneMedia-TVprog	56.30	
ONLINE PAYMENT	AP	7/8/2011	July 2011	Citic-TVprogram	4,314.71	
50534	AP	7/15/2011	July 2011	Point7Creative-TVpubORegC - Point7Creative-TVprog	590.00	
50548	AP	7/18/2011	July 2011	FedEx-TVprogTapesSent	41.60	
50594	AP	7/21/2011	July 2011	Point7Creative-TVwebVAP - Point7Creative-TVprog	500.00	
50618	AP	7/28/2011	July 2011	Point7Creative-TVwebstCSe - Point7Desgn-TVprog	590.00	
50691	AP	8/4/2011	August 2011	Point7Creativ-TVorWebCSeg - Point7Creatv-TVprogram	610.00	
ONLINE PAYMENT	AP	8/5/2011	August 2011	Citic-TVprograms	13,831.00	
50692	AP	8/10/2011	August 2011	Point7Creative-TVcsWebstE - Point7Creatv-TVprogram	660.00	
50762	AP	8/17/2011	August 2011	FedEx-TVprogSendTapes	41.06	
50771	AP	8/17/2011	August 2011	KathInEgersheim-TVsup - KathleenEgersheim-TVsup	112.59	
50800	AP	8/17/2011	August 2011	TribuneMedia-TVprog	56.30	
50833	AP	8/18/2011	August 2011	Point7Creativ-TVegCSpubFR - Point7Creatv-TVprog	590.00	
50887	AP	8/25/2011	August 2011	Point7Creative-TVkcWebFR - Point7Creatv-TVprogram	575.00	
50910	AP	9/1/2011	September 2011	Point7Creative-TVegFRwebC - Point7Creative-TVprog	565.00	
50969	AP	9/8/2011	September 2011	Point7Creative-TVcsKCpub - Point7Creative-TVprog	485.00	
ONLINE PAYMENT	AP	9/9/2011	September 2011	Citic-TVprograms	4,000.00	
50996	AP	9/13/2011	September 2011	FedEx-TVprogTapes - FedEx-TVprogTapesSent	41.06	
51032	AP	9/13/2011	September 2011	TribuneMedia-TVprog	45.04	
51057	AP	9/15/2011	September 2011	Point7Creative-TVorEGfrAd - Point7Creative-TVprog	475.00	
51073	AP	9/20/2011	September 2011	EvanSmith-TVminVideo	120.00	
51100	AP	9/22/2011	September 2011	Point7Creative-TVorWebCS - Point7Creative-TVprogram	525.00	
51139	AP	9/29/2011	September 2011	Point7Creative-TVwebCSann - Point7Creative-TVprogram	500.00	
51215	AP	10/6/2011	October 2011	Staples-OFFpapr20rmCopyLa - Staples-TVminTapes	61.96	
51217	AP	10/6/2011	October 2011	TribuneMedia-TVprog	45.04	
51221	AP	10/6/2011	October 2011	Point7Creative-TVfrEGcsOR - Point7Creative-TVprog	600.00	
ONLINE PAYMENT	AP	10/7/2011	October 2011	CitiC-TVprog	4,300.65	
51245	AP		October 2011	HomeDepot-TVminTransBooth - HomeDepot-TVminSup	19.92	
51258	AP		October 2011	Point7Creative-TVcsEG FR - Point7Creative-TVprogram	630.00	
ONLINE PAYMENT	AP		October 2011	CitiC-TVprograms	9,200.00	
51286	AP		October 2011	FedEx-TVtapeSent	20.62	
51290	AP		October 2011	Ocelmag-EGcopiesOFFcopies - Ocelmagstc-TVcopies	0.75	
51307	AP		October 2011	OceFin-Copies - OceFin-TVcopies	2.85	
51328	AP		October 2011	Point7Creative-TVcsWEbEGf - Point7Creative-TVprog	515.00	
51368	AP	10/27/2011	October 2011	Point7Creative-TVegFRcs - Point7Creative-TVprog	445.00	
51424	AP	11/2/2011	November 2011	TribuneMedia-TVprog	45.04	
51449	AP	11/3/2011	November 2011	Point7Creative-TVwebsPubF - Point7Creative-TVprog	575.00	
ONLINE PAYMENT	AP	11/3/2011	November 2011	Citic-TVprograms	685.00	

New Life Worship Center Account Activity, January 2011 - December 2011

12/06/2011 09:19 AM

Page: 3

Reference	Journal	Date	Month	Description	Debit	Credit
51494	AP	11/10/2011	November 2011	Point7Creative-TVcsEGfrMA - Point7Creative-TV	prog 595.00	
51531	AP	11/18/2011	November 2011	Petty-5049,55,58,59,63 - Petty-#5049,59TVminGa	asErr 20.00	
51534	AP	11/18/2011	November 2011	Point7Creative-TVprogEGfr - Point7Creative-TVp	rog 780.00	
ONLINE PAYMENT	AP	11/22/2011	November 2011	CitiC-TVprogShows	10,150.00	
51554	AP	11/23/2011	November 2011	Point7Creative-TVcsAnnoun - Point7Creative-TV	prog 780.00	
51638	AP	12/6/2011	December 2011	FedEx-TVkprogSendTapes - FedEx-TVprogSend	Tapes 40.88	
51668	AP	12/6/2011	December 2011	Staples-TVprogSupMensBrkf - Staples-TVprogCorkBrdPlas	99.55	
51672	AP	12/6/2011	December 2011		56.30	
				Subtotal	99,035.71	
				TV-Programs Current Ba	lance 99,035.71	
				Total Debits & Credits	99,035.71	0.00

New Life Worship Center Account Activity, January 2011 - December 2011

12/06/2011 09:20 AM

-				- 6
_	2	a	0.	-1
_	a	u	⊂.	- 1

Reference	Journal	Date	Month	Description		Debit	Credit
07-1829-000 Televi	sion Eq	uipment			Beginning Balance	177,251.50	
ONLINE PAYMENT	AP	3/8/2011	March 2011	Citic-TVprogAsstsCompPrt		151.98	
ONLINE PAYMENT	GE	4/7/2011	April 2011	Citic-TVasstCompPart		295.00	
MAY-2650	GE	5/26/2011	May 2011	YrEndReclsVideoToastrSale		2,973.46	
ONLINE PAYMENT	AP	10/7/2011	October 2011	CitiC-TVassetZoomLensGrip		1,241.59	
ONLINE PAYMENT	AP	11/22/2011	November 2011	CitiC-TVasstsAppleComp		3,384.00	
					Subtotal	8,046.03	
				Television Equipment	Current Balance	185,297.53	
07-1851-000 Accur	nalated l	Depreciatio	n		Current Balance	108.50	
				Tota	l Debits & Credits	8,046.03	0.00



Federal Communications Commission Washington, D.C. 20554

September 22, 2006

Reference: CGB-CC-0006

Brian Cooney New Life Worship Center 915 Douglas Pike Smithfield, RI 02917

Re: Petition for exemption from the closed captioning rules under the "undue burden" standard, 47 C.F.R. § 79.1(f)

Dear Mr. Cooney:

As you were previously notified, the Federal Communications Commission received the petition you filed on behalf of New Life Worship Center on October 5, 2005 seeking an exemption from the closed captioning requirements set forth in section 79.1 of the Commission's rules. The exemption sought was based on the undue burden standard set forth in section 79.1(f). As explained below, after careful consideration we grant your petition for exemption from the closed captioning requirements for your "Life in Christ" program.

Pursuant to section 79.1(f) of the Commission's rules, an exemption from closed-captioning requirements may be granted for a channel of video programming, a category or type of video programming, an individual video service, a specific video program or a video programming provider upon a finding that the closed captioning requirements will result in an undue burden upon the petitioner. Furthermore, the statute and the Commission's rules define the term "undue burden" to mean "significant difficulty or expense." Applying this standard, the Consumer and Governmental Affairs Bureau recently issued an Order granting exemptions from the closed captioning requirements under the undue burden standard to two entities that are similarly situated to the petitioner in the instant case. In that Order, the Bureau noted that in addressing undue burden petitions:

¹ 47 C.F.R. § 79.1, implementing section 713 of the Communications Act of 1934, as amended, 47 U.S.C. § 613, which was added to the Communications Act by section 305 of the Telecommunications Act of 1996, Pub. L. No. 104-104, 110 Stat. 56 (codified at 47 U.S.C. § 151 et seq.).

² 47 U.S.C. § 613(e); 47 C.F.R. § 79.1(f)(2).

³ Anglers for Christ Ministries, Inc., New Beginning Ministries, Video Programming Accessibility Petitions for Exemption from Closed Captioning Requirements, Case Nos. CGB-CC-0005 and CGB-CC-0007, Memorandum Opinion and Order, DA 06-1802 (CGB rel. Sept. 12, 2006).

[W]e must "balance the need for closed captioned programming against the potential for hindering the production and distribution of programming." For these reasons, we note that, in the future, when considering an exemption petition filed by a non-profit organization that does not receive compensation from video programming distributors from the airing of its programming, and that, in the absence of an exemption, may terminate or substantially curtail its programming, or curtail other activities important to its mission, we will be inclined favorably to grant such a petition because . . . this confluence of factors strongly suggests that mandated closed captioning would pose an undue burden on such a petitioner.⁴

After careful review of the circumstances set forth in your petition, and in light of the relevant precedent discussed above, we conclude that application of the closed captioning requirements in this case would cause an undue burden. We therefore grant your petition pursuant to section 79.1(f).⁵

Any inquiries regarding this matter should be directed to the undersigned at (202) 418-1475 (voice), (202) 418-0597 (TTY), or Thomas.Chandler@fcc.gov. Please refer to the case identifier number noted above in any email correspondence or telephone conversations with Commission staff.

Sincerely,

Thomas E. Chandler

Chief, Disability Rights Office

The E Chall

Consumer and Governmental Affairs Bureau

⁴ Id. at para 11 (citation omitted).

⁵ Section 79.1(f) sets forth certain procedures to guide the Commission's consideration of undue burden petitions, including that the petition be placed on Public Notice and that the petition contain detailed facts supported by affidavit. 47 C.F.R. § 79.1(f)(5)-(9). The Commission, however, may waive its rules for good cause, and, in light of the facts set forth in your petition and the precedent discussed above, we conclude that waiving these requirements in the instant case is consistent with the public interest.

ClosedCaption Maker

SERVICE-DISABLED VETERAN-OWNED SMALL BUSINESS

1955 Kensington Street

WGallant@COm.

FCC Closed-Captioning Exemption Rule Changed

You have options:

1. The least expensive way is to supply the TV station a CCed DVD. We create a 'caption file' you add to the DVD; Apple DVD StudioPro/Encore. Cost is \$100/per half-hour weekly program.

2. We sell a turnkey closed-captioning system; cost is \$1600. Designed to be easy to use and creates a CCed BetaSP tape. 30-day money back guarantee. System is called AddRollupCC.

3. You can send us a DV/BetaSP tape, we create a CCed BetaSp and forward it to the TV station. Cost is \$150/per program.





New Life Worship Center TV Production 915 Douglas Pike Smithfield, RI 02917

Dynami CC aptioning

	Taped Encoding					
Program Length	Analo	og / SD	HD	Таре		
	Beta SP	DigiBeta	HDCam	Stock		
30 Minutes	\$95	\$120	\$120	To be provided by client or by Dynamic at wholesale cost.		
60 Minutes	\$180	\$210	\$240			

Need your media encoded to tape. We can help.

For taped encoding an uncaptioned master must to mailed to our Grand Rapids office in the broadcast format.



Attn: Director of Communications

New Life Worship Center 915 Douglas Pike Smithfield, RI 02917



Dynamic Captioning LLC

5740 Foremost Drive SE Grand Rapids, MI 49546 Call Toll Free 866.355.0811

www.DynamicCaptioning.com



FCC overturns 298 previously granted closed captioning waivers.

On October 20th, 2011 the FCC issued an order overturning closed captioning waivers, and which will require programming to be captioned commencing January 19th, 2012.

Dynamic Captioning is a full service provider of captioning & encoding, and can fulfill your FCC requirements with accurate and dependable service at competitive rates.

Call today for service and ask for Craig!

CALL TOLL FREE 866.355.0811



- Real-Time
- Offline
- English and Spanish

Program Length		nglish Caption	ning
	Origination Of	Real-Time	
	Pop-On	Rollup	Keai-Time
30 Minutes	\$230	\$165	\$60
60 Minutes	\$459	\$330	\$110

FTP proxy file and (cc) file transfer available in a number of compatible file formats.

Dynamic Captioning LLC

5740 Foremost Drive SE Grand Rapids, MI 49546 CC